

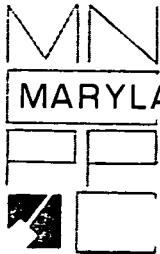
R. M. Wines

Report of the
CITIZENS TECHNICAL ADVISORY COMMITTEE
on
Guidelines For The Administration Of The
ADEQUATE PUBLIC FACILITIES ORDINANCE
October 6, 1982



Report of the
CITIZENS TECHNICAL ADVISORY COMMITTEE ON GUIDELINES FOR
THE ADMINISTRATION OF THE ADEQUATE PUBLIC FACILITIES ORDINANCE

October 6, 1982



THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION
8787 Georgia Avenue • Silver Spring, Maryland 20907

October 6, 1982

Citizens Technical Advisory Committee
on Adequate Public Facilities.

Norman L. Christeller, Chairman
Montgomery County Planning Board
8787 Georgia Avenue
Silver Spring, Maryland 20907

Dear Mr. Christeller:

On behalf of the Citizens Technical Advisory Committee on Guidelines for the Administration of the Adequate Public Facilities Ordinance, I am pleased to forward herewith the committee's report. The conclusions and recommendations it contains are the result of lengthy discussion. We sincerely hope they will be helpful to the Planning Board.

The committee is most appreciative of the excellent support we have received from Richard Tustian and members of the staff. In particular, we wish to thank Barbara Habhab, Lael Holland, Patricia Willard, Robert Winick and Jeff Zyontz who attended our meetings regularly through 22 sessions.

Serving on this committee has been an interesting and rewarding experience, I think for all of us.

Sincerely,

Rosalie J. Silverberg
Chairman

RJS:ms
Enclosure

THE COMMITTEE

The committee consists of twelve persons selected by the Planning Board on the basis of (1) their prior reputations for thoughtful contributions to public policy decisions; and (2) their differing perspectives derived from their individual areas of residence and past experience. Each member was asked to function as an individual, but also to bring to the committee's deliberations the general perspective of his or her previous experience. Six members come from a local or sub-regional civic association background, each from a different area of the county. Five members come from a private sector development background, representing both large and small-scale builders, development advisory professionals, and other broad-scale economic development interests. The chairperson has had a longstanding interest in Montgomery County's governmental affairs. The members of the committee are:

Jay Alfandre
Barbara Foresti
Mary Lou Fox
Dean Gibson
Carol Henry
William Hurley
Jody Kline
Austin Leake
William Mohler
John Neumann
Rosalie Silverberg (Chairperson)
David Weiss

In addition, the following served in an Ex-Officio capacity:

Ioanna Morfessis, Montgomery County Department of Economic Development
John Clark, Montgomery County Department of Transportation
Craig Hedberg, Montgomery County Department of Transportation
Linda Raab, Montgomery County Department of Environmental Protection
Robert Shinham, Maryland Department of Transportation
Margaret Ballard, Maryland Department of Transportation

FOREWORD

The committee appreciates the extensive work done by the staff of the Planning Board in providing background materials, explaining concepts and methodologies, responding to questions raised, preparing requested data and summarizing the proceedings of the meetings. In particular, the committee wishes to thank those staff members who regularly attended meetings -- Robert Winick, Patricia Willard and Barbara Habhab from the Division of Transportation Planning; Jeff Zyontz from the Special Projects Division; and Lael Holland from the Office of the Planning Director -- for their valuable assistance. The committee would also like to thank Marie Steingrebe for her assistance in the typing of this report.

Finally, to Richard Tustian, Planning Director, the committee's thanks for being always available to assist in any way in the deliberations.

The committee appreciated the regular attendance and the contribution of the ex-officio members: from the county, Ioanna Morfessis, Department of Economic Development; John Clark and Craig Hedberg, Department of Transportation; Linda Raab, Department of Environmental Protection; and from the state, Robert Shinham and Margaret Ballard from the Department of Transportation. The meetings of this committee have been an excellent example of the kind of communication, cooperation and coordination of effort that the committee believes is so important to mutual understanding.

INTRODUCTION

The 12 member Citizens Technical Advisory Committee on Guidelines for the Administration of the Adequate Public Facilities Ordinance (CTAC) met on 22 occasions between March 3 and September 22, 1982 to review, consider, question and discuss the concepts, principles and methodologies in the 1981 Report on Comprehensive Planning Policies (CPP report) and the application of the Adequate Public Facilities Ordinance (APFO). The first six sessions were briefings by planning staff. The subsequent 16 meetings were devoted to discussion of a list of issues identified by committee members, the Chairman of the Planning Board (MCPB) and the County Executive.

All meetings were informal. Decisions were reached by consensus. In most instances, conclusions and recommendations reflect a remarkable degree of accord among those present at that meeting. The general conclusions, the points of consensus on specific issues and the expressed concerns are underlined in the ensuing text, numbered in the margin and listed in order in the summary starting on page 13.

THE CPP REPORT - HOW IT CAN BE USED

The CTAC accepts the basic concept of staged growth in Montgomery County as outlined in the 1981 CPP report. The CTAC views the current guidelines for administering the APFO as a more comprehensive and generally improved approach compared to the localized APFO test used heretofore. As with any new system, there are problems, some related to policy, some of a technical nature. The committee believes these problems are surmountable and offers a number of specific recommendations which the members believe will result in improvements.

In general, decisions about the overall amount and location of development should be made as part of the master plan and zoning processes and these decisions should generally be followed during the development review process. Inasmuch as master plans should serve as reliable guidelines for future development, all parties concerned, the County Executive, the County Council and the MCPB, should work together in the development of master plans, starting early in the process.

Furthermore, the committee believes that policies promulgated by government that will have an impact on public facilities, such as those related to housing and economic development, must be accompanied by a commitment to provide the public facilities necessary to support the resultant development.

In this regard, the CPP report can be a very useful document, serving to alert appropriate agencies to future needs for public facilities, because it brings together in one place a wealth of material related to the land use planning process. It contains summary material about development plans and policies, including the staging elements in current master and sector plans; forecasts for households and employment; the status of development in progress; proposed staging as governed by thresholds; and guidelines for administration of the APFO. The committee feels strongly that the CPP report should play a role in the coordination of growth in the county with the provision of adequate public facilities and that it is the public sector's responsibility to provide public facilities.

Land use planning policies, as delineated in master and sector plans and the CPP report, definitely interrelate with other policies and means of implementation such as the Housing Policy, economic development policies, County CIP, Ten-Year Water and Sewer Plan and Solid Waste Plan, and the state Consolidated Transportation Program. The committee believes these interrelationships need to be more clearly understood by those at the highest levels of government who are charged with making and implementing policy. The committee urges, as have others before, that the elected and appointed officials of the county establish some form of a structured mechanism to improve communication and thus enhance this understanding among the County Executive, the County Council, the County Delegation to the state legislature and the Planning Board. The committee understands that a degree of flexibility is inherent, but strongly believes that better communication on a more formal basis is essential if the necessary coordination is to be achieved.

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THE THRESHOLDS - HOW THEY ARE SET

The establishment of thresholds is basic to the whole staging process. Obviously how they are set is of the utmost importance.

Comments on Basic Information

8. The committee accepts the basic concept of policy areas, each with its own threshold for housing and employment based on existing or programmed public facilities in that policy area. In general, the boundaries of these policy areas seem logical and, although certainly not a match, seem to fit reasonably well with planning area boundaries and transportation patterns.

9. The 1981 CPP report states that transportation facilities are the appropriate limiting criteria for determining the thresholds over the next six years. In accepting this judgement, the committee recognizes that other criteria may emerge during that period. The two measures for transportation, roads and transit, are appropriate and should indeed be combined to provide a measure for a Total Transportation Standard for each policy area.

10. The committee agrees with the concept of determining the thresholds annually by a method that makes clear the reasons for the selection of the particular numbers of dwelling units and employees that MCPB finds will give an acceptable balance among and within the policy areas.

Committee discussion of levels of service and congestion in urbanized, as opposed to rural areas of the county led to recognition that higher levels of congestion will be tolerated in urban areas. One reason is that transit is available or programmed. The committee feels it is in no position, however, to state what those levels should be, but does recommend including in the CPP report a clear statement to the effect that different standards of tolerance of traffic congestion exist among the several transportation policy areas.

11. The level of service for each policy area is expressed as an average. Thus, on some road segments, congestion will exceed the average, on others it will be less than average. An effort should be made to minimize the vehicle miles traveled at LOS E and F on individual road segments in a given policy area. This should be done before setting the threshold for that policy area. The committee recommends that MCPB staff use as a guide the figures in the table of average roadway levels of service for policy area groups on page 78 of the Comprehensive Staging Plan (1980).

12. The central technical methodology used in selecting thresholds is a computerized transportation demand modeling system, called Transportation Integrated Modeling System (TRIMS), developed in the early and mid-70's by staff of the Metropolitan Council of Governments (COG). Planning Board staff adapted TRIMS to its own use and has run it independently from COG for several years. The committee accepts the MCPB rationale for using this older version of TRIMS as a stable base for current APF planning purposes, recognizing that it allows for comparative planning in the metropolitan region. However, for reasons explained below, the committee feels that a

determined effort should be made to refine it. By so doing, the existing transportation modeling system can provide a better basis for the APF process and other county planning processes.

In gathering data for modeling, staff relies on forecasts and estimates and the committee found this a cause for some concern. Data by traffic zones is used in charting forecasts, pipelines, building permits and completions. Questions were raised about aggregating this data into various types of areas and how this might affect the accuracy because planning, master plan and policy areas have somewhat different boundaries. Concern was also expressed in regard to COG Cooperative Forecasting data. The committee recommends increased emphasis on identifying any skewing that may occur as a result of using these forecasts and estimates. It is important that the population and pipeline figures reflect reality as closely as possible in order that projects in the CIP, necessary to accommodate development, are neither premature nor tardy.

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There are many other instances in the process that necessarily require staff to exercise a great deal of judgement and to use assumptions. Staff must estimate new capacity added by new roads, decide on the combinations of dwelling units and jobs to try in a TRIMS run, interpret the result of a TRIMS run, and, if necessary, try new combinations of land uses. An acceptable balance of land uses should be one that keeps to a minimum the number of severely congested road links, and this may require testing several combinations of dwelling units and employees. Validation of the judgements and assumptions is sometimes possible, but not always. The CTAC believes the maximum number of safety checks possible should be built into the process for setting the thresholds.

14.

Review of the Model

The committee reviewed TRIMS in several ways. A staff technical group met twice to discuss a list of technical questions submitted by the Montgomery County Department of Transportation (MCDOT). The group included staff from the MCDOT, Maryland DOT and the MCPB Division of Transportation Planning. Several members of the committee also attended. The technical matters discussed included, among others, the internal road link and centroid connector network used in TRIMS; service volumes, speeds and peak hour percentages assigned to those links; trip generation rates; sensitivity of the model to the location and volumes of traffic on connectors from outside the county; scope of capital projects reflected in the computer network; and impact of development along policy area boundaries. The result of these meetings was general agreement that Planning Board staff would examine these technical matters and make improvements as soon as feasible. The committee believes that time and resources should be made available for the purpose of improving the model.

Three committee members with experience in computer applications met as a subcommittee to review TRIMS. The full committee accepts their specific recommendations. The first is for a more detailed examination of the model, its data and its behavior with a view toward model improvements. Despite MCPB refinements in its use of TRIMS, the last validation

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run in 1981 using 1977 data showed deviations from 1977 traffic maps for many roads or road segments. In addition, TRIMS appeared systematically to assign lesser traffic than 1977 ground counts to smaller volume roads and/or to roads in lesser developed areas of the county and more traffic than 1977 counts to roads in some downcounty areas.

The subcommittee also recommends study of the sensitivity of the model to changes in internal model parameters and input variables including those related to demographic characteristics of households in various parts of the county. Such a study would reveal which parameters and variables have the greatest effect on thresholds.

In addition to these technical comments on TRIMS, the subcommittee recommends that staff begin now to look at newer methods and features already in other transportation modeling systems. Two matters of specific interest are:

1. an intersection submodel for nodes in the road network because predicting critical intersections appears to be as important as areawide congestion in many areas;
2. an improved submodel for public transit that would handle both rail and bus, because the comprehensive planning policies are based on an Integrated Total Transportation concept and TRIMS provides only a "sketch planning" capability for transit.

The committee recommends that, when the model can handle intersections, the MCPB explore the possibility of imposing explicit limits on the number of LOS E and F intersections in a given policy area.

The subcommittee, based on its members' experience with computer applications, recommends better documentation of the TRIMS systems, better documentation for a TRIMS user and better logs of TRIMS runs. The subcommittee also recommends a broadened in-house knowledge of the model and how to use it. At present, only a limited number of staff know and run TRIMS and know what input is used in each run or update to the network link files.

A further recommendation is that staff prepare a document describing fully the principles and methods used in determining the thresholds. Some of this information is now available, scattered in various Planning Board policy reports and supplements. A separate general document with specific references to technical details could be kept current from year to year and would be valuable to the Board and its staff, as well as other county officials and the public.

The full committee specifically raised questions about the values used in TRIMS for trip generation rates--household income, household size, trip destination. The basic generation rates currently used are old (revised in 1975). The committee was told that they were spot checked in 1980 and found to be satisfactory, but still questions whether they will remain valid because of changing demographics and lifestyles. Staff plans to update the

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commuting patterns in the model on the basis of data from the 1980 census. The committee suggests that the basic trip generation rates need to be more thoroughly validated.

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At the present time the full capacity of a future road is considered as available when at least 50 percent of the construction funding for the road is provided in the county CIP or the state CTP. The committee accepts that percentage as reasonable and does not recommend any change at this time. However, very large projects or long roads pose a special problem. The committee believes it would be desirable, for the purpose of establishing thresholds, to separate into functional, policy area segments those major road projects that cross several policy areas or that will be built in stages. Great Seneca Highway is one that fits this description at the present time; there may be others in the future. The committee recognizes that for a variety of reasons a single road project must be included in the CIP as a whole, not as a number of separate segments. Even so, it may be possible to consider it segmentally, if information regarding the proposed sequence of construction is available. The committee suggests that in such cases the Planning Board exercise judgement and make the decisions as to which parts of the whole should be entered into the model, rather than including the entire project. Thus, each segment could be related to the specific area of its primary impact, i.e., segments that might not receive 50 percent construction funding within the six years of the CIP would not be considered prematurely as creating capacity for additional development.

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The full committee discussed, but did not resolve, the potential problem of errors that occur in TRIMS results because the road network used in the model omits some roadways that carry significant amounts of traffic. This traffic is now assigned to the road links used in the model. The committee also observed that certain municipalities (Rockville and Gaithersburg in particular) do not have ordinances comparable to the county's APFO. Inasmuch as TRIMS uses data on road links and land uses in those areas, the effects of development within the municipalities are factored into threshold setting for APF policy areas.

The committee also discussed the problem of traffic entering the county from other jurisdictions, primarily from Frederick and Howard Counties, and its effect on highway congestion. The Planning Board already has made a policy decision to use LOS D/E in setting the threshold for Route 29 (Fairland/White Oak policy area), acknowledging that LOS D/E is higher than desirable given the current level of transit service. No similar adjustment was made for I-270. While noting that the Planning Board and staff are fully aware of the problems of external traffic, the committee nevertheless is concerned about the long-term effects of traffic coming into the county or passing through from elsewhere.

23.

THE THRESHOLDS - HOW THEY ARE USED

Most of the committee's discussion of how the thresholds are used focussed on residential development. To a lesser extent, the committee discussed economic development, acknowledging that the problems associated with it are different and therefore may require different standards.

The committee recognizes the obvious importance of economic development projects to the county.

The threshold is the level at which the average traffic volume in a policy area, generated by a specific combination of dwelling units and employees, can be met by the existing and programmed transportation system at the average level of service for the area. Thresholds are expressed as numbers of dwelling units or employees. Each application for subdivision must undergo a test to determine whether the new project will exceed the established threshold for the policy area when added to existing development and development in the pipeline.

To apply the APF test at an appropriate point in time, it is necessary to know the extent to which projects already in the pipeline will use the capacity of the existing and programmed transportation facilities. The development pipeline is constantly changing because new projects enter, other projects are completed or abandoned, and there is a significant dropoff at each stage in the development approval process. Thus, the "pipeline number" can vary depending upon the point in the approval process at which the count is made.

The committee recommends:

- (1) that the point for testing a new project continue to be at preliminary plan; and 24.
- (2) that the point for counting projects within the pipeline against the threshold of available transportation capacity continue to be at the point of sewer authorization. 25.

In keeping the point for counting projects at sewer authorization, the committee recognizes that it is possible for a pipeline of sewer authorizations to accumulate. It is unlikely that this entire pipeline will actually be built-out within the six-year time frame of the CIP. The objective of the APF test is to avoid building before public facilities are available. Since this requires comparing the most realistic estimate of private sector build-out with the most realistic expectation for provision of public facilities within the same time period, the committee recommends incorporating a pipeline discounting process into the system for applying the thresholds.

For dwelling unit development, the method of discounting proposed by MCPB staff, and accepted and recommended by the committee, should be applied by policy area and reviewed annually. It consists of three elements. 26.
The first concerns those projects with sewer authorizations more than seven years old. The committee feels it is reasonable to assume, based on historical performance, that only 10 percent of these are likely to be built; thus, the remaining 90 percent can be put into the discount. The second element relates to the development of apartment units. At the time of this report, economic and market conditions suggest that there is not likely to be much apartment construction in the near future. The committee therefore recommends adding to the discount for a policy area all planned apartment units which exceed the forecast figures for apartment development in that

policy area. The third element relates to large developments. Assuming an average buildup of 50 units per year, again based on historical performance, the committee recommends that units in excess of a six year total of 300 be discounted.

The discounts should be determined and applied on a policy area basis and be part of the annual threshold setting process. Care must be taken to avoid double counting units with old sewer authorizations and units that are discounted as part of the second or third elements.

Once a policy area has reached its threshold, it will be possible under this system to approve additional development until the units released by discounting for the policy area are exhausted. The committee believes that initially some limitation on the use of these units should be imposed and feels that 75 dwelling units in excess of the threshold, including MPDU's, should be the maximum approved per year for any one project or one ownership. The purpose of the limitation is to prevent stockpiling and assure an equitable distribution of the discounted units. Each project should undergo local area review to ensure that the approval will not have a detrimental effect on the surrounding transportation network.

For non-residential development, (i.e., employment), the committee also recommends applying a discount to various components of the pipeline, by policy area, and with annual review, to achieve a more realistic projection of the number of employees who will occupy future buildings and thus a more realistic projection of available threshold capacity.

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The method of discounting proposed by MCPB staff and the Office of Economic Development (OED), and subsequently accepted and recommended by the committee, consists of two elements. The first is to separate out office space from the list of proposed projects. The committee believes there is evidence to demonstrate that this segment of the market has softened significantly within the last year and will not recover quickly. The second is to separate speculative office development from total office space. The committee believes that speculative projects, which will have difficulty securing financing in a tight money situation because they lack firm occupancy commitments, are the most likely to be deferred indefinitely in the face of increasing vacancy rates throughout the County and the metropolitan area.

A report and recommendation about which speculative office projects are unlikely to go forward can be made by staff of OED and transmitted annually to MCPB staff. Final judgement should be made case-by-case by evaluating (1) if there has been no progress through the development pipeline since sewer authorization; (2) if there has been no progress in obtaining lease commitments and financing; and (3) if the project has not risen to the level of printed notice in commercially published lists of proposed office space. Projects deemed highly unlikely to develop within the time frame of the CIP should be discounted.

The committee recommends an annual review of the discount process to determine that the conditions that gave rise to the assumptions have not

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changed, that the assumptions used are still valid and that the amount of capacity generated by discount is consistent with experience.

As part of the discussion of discounting, the committee also considered the issue of "float." This occurs because the point of the APF test (preliminary plan) comes before the point for counting projects in the pipeline (sewer authorization). In the interval between the two, it is possible that units may be approved after the threshold for a policy area has actually been reached but before sewer authorizations for previously approved projects are issued and counted against the threshold. It is important to note that not all approved preliminary plans proceed through sewer authorization, let alone construction. There is some risk that overburdening of public facilities may result if all units within the "float" are developed within a short period of time. That risk must be weighed against the desire of the county to have a sufficient stock of housing to meet the needs of its citizens, as well as continued economic development for the well-being and future of the county. The committee suggests that staff keep the MCPB current with respect to the size of the "float" insofar as possible. The committee also suggests that the CPP report refer to the "float" and include figures for the preceding year.

LOCAL AREA REVIEW

One of the purposes of local area review is to permit the MCPB to withhold approval of a project, even though it is within the threshold, if that project would produce excessive local traffic congestion.

Local area review should be continued in its present form for a period of one or two years, during which time it should be monitored to determine whether it is accomplishing the intended purposes. For the time being, at least, the committee accepts the guidelines and believes that 50 trips generated during the peak hour is an appropriate triggering level. The committee recommends that during the period of the test, local area review should not be initiated by citizen request.

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At the present time and for the purposes of local area review, the point of count for considering approved projects as contributing traffic to a local area is at record plat. The committee considered the desirability of moving that point back in time to sewer authorization, with a discounting procedure analogous to that recommended above for interpreting the thresholds. The committee was split on whether such a change was desirable.

Some members expressed concern about situations arising in which a large amount of residential or employment development could receive preliminary plan approval, under local area review, and remain unrecorded while subsequent additional large amounts of development were approved. Thus, a large "float" would be created that would result in excess traffic congestion if all this approved development were to build out rapidly and the CIP were not augmented to accommodate it.

Other members of the committee, however, pointed out that there were significant legal, policy, and administrative problems with attempting to make such a change in the local area review procedure. For example, making the necessary detailed calculations could result in significant delay in the preliminary plan approval process.

The possibility of relying on Planning Board discretion to determine if sewer authorization should be used in certain particular cases was discussed, but no agreement on this point was reached. The committee finally concluded, unanimously, to recommend that whenever the MCPB becomes aware of the potential for excessive local traffic congestion, the Board should notify appropriate county government officials so that they may make suitable accommodations in the CIP without necessarily waiting for the next regular CIP cycle.

The committee was almost equally divided on another matter of concern expressed by some of the members who believe that calculated levels of service, at certain intersections, are inconsistent with the perceived levels of service. The committee unanimously recommends that staff explore this matter in more detail.

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THRESHOLD FLEXIBILITY AND DEVELOPER PARTICIPATION

While recognizing that there must be flexibility, the committee nevertheless expressed a desire for caution in allowing the thresholds to be exceeded and recommends stronger language to that effect in this section of the CPP report. A clear statement should also be included to the effect that the guidelines anticipate that the public sector will meet the needs when development is in accordance with master plans and established county policies. The intent is to put much more emphasis than at present on the committee's strong feeling that the thresholds are both a means of alerting the public sector to the need and to its responsibility for providing public facilities and a measure of capacity for purposes of administering the APFO.

There may well be particular instances when, for specific projects, it would be in the best interests of the county as a whole to exceed a threshold temporarily in order to implement certain public policies, such as those related to housing and economic development or to provide for other needed and desirable services such as police, fire and health. The committee feels strongly that the Board should be able to do so but feels equally strongly that the Board should use this ability sparingly and that the county should, as soon as possible, program the facilities necessary to raise the threshold for the area, and thereby permit implementation of the specific public policy objectives.

The current guidelines offer developer participation in road building as a means of satisfying APF requirements if a threshold has been reached. In some areas of the county, there is now so much developer participation, the role of the public sector is uncertain.

The committee recognizes that the APFO explicitly allows for private financing of roads needed to accommodate traffic generated by a specific

subdivision. The committee also recognizes the restraints that current economic conditions place on both the state and county when it comes to the ability to finance road building. The committee is aware that part of the present problem, particularly in those upcounty areas where new subdivision approval is denied unless developers are willing to contribute to the necessary roads, may be a matter of developer unwillingness to wait until such time as the roads can be included in the CIP or CTP.

Nevertheless, the committee strongly believes it is the public sector's responsibility to provide roads--that government should be the road builder, not "clubs" or other private means. The APFO is a tool for orderly growth and should not be used by government as a means of avoiding its responsibility for providing adequate public facilities.

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The committee wishes to make clear, however, this does not refer to internal roads within a subdivision that ordinarily are the responsibility of a developer. Nor should it be interpreted as a recommendation to preclude totally developer participation in a road project. There may be circumstances in which such participation is in the best interests of all concerned.

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The committee discussed the fact that there are problems with road "clubs," such as difficulty in administration, determining how the small developer fits in, etc., that make them far from ideal. The committee urges the Board and other appropriate government agencies to address this issue.

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Finally, the committee recommends that the guidelines include and emphasize alternative ways to avoid traffic congestion and thus satisfy the APFO requirements, focussing on moving people rather than vehicles. Several means are suggested, such as expanded Ride-On service, Ride-Sharing, Vanpooling, shuttle bus service, park-'n'-ride lots and staggered employment hours. The committee believes all are worthy of consideration where there is evidence that they will produce long-term reduction in traffic and thus reduce the need for road building. Implementation and enforcement of such alternatives will require a considerable degree of coordination among county agencies and between county agencies and the private sector.

IMPROVING THE DOCUMENT

38.

The staging concept in its present form has evolved over a period of several years. The 1981 CPP report assumed a considerable knowledge of the details of the planning process and a familiarity with various growth policy and planning documents that preceded it. The committee believes that, in addition to referring readers to earlier documents, the CPP report should include more in the way of explanation for those who may not be so familiar with the background. There is an apparent need for clarification of the quotations from master plans in the chapter on Development Plans and Policies in the 1981 report. An explanation of the role of the staging elements is also needed.

The APF guidelines are based on policy areas. It would be helpful if there were a definition of policy areas, an explanation, albeit brief, of how their boundaries are determined, and a brief statement regarding their relationship to master plan areas.

Even though Appendix I of the Comprehensive Staging Plan (1980) explains the transportation standards in detail, the committee feels that the CPP report should include some explanation of how the standards are set, and more of an explanation than in the 1981 document of how transit availability relates to levels of service.

IN SUMMARY...

The following is a list of the findings of the committee, in summary form, and in the order in which they appear in the text.

5 - Text paragraphs to
The CPP Report - How It Can Be Used

1. The CTAC accepts the basic concept of staged growth in Montgomery County as outlined in the CPP report. (Page 3.)
2. Current guidelines for administering the APFO are a more comprehensive and generally improved approach compared to the APF test used heretofore. (Page 3.)
3. Decisions about the overall amount and location of development should be made as part of the master plan and zoning processes and these decisions should generally be followed during the development review process. (Page 3.)
4. The County Executive, County Council and MCPB should work together in the development of master plans, starting early in the process. (Page 3.)
5. Policies promulgated by government that will have an impact on public facilities must be accompanied by a commitment to provide the necessary facilities. (Page 3.)
6. The CPP report should play a role in the coordination of growth in the county with the provision of adequate public facilities; it is the public sector's responsibility to provide public facilities. (Page 3.)
7. The committee urges that elected and appointed officials (County Executive, County Council, MCPB, and delegation to the state legislature) establish some form of mechanism to improve communication and thus enhance their understanding of the interrelationships among land use planning policies and other county policies, and county and state means for implementation. (Page 3.)

The Thresholds - How They Are Set

8. The committee accepts the basic concept of policy areas with thresholds; policy area boundaries seem logical. (Page 4.)
9. The two measures for transportation (roads and transit) are appropriate. (Page 4.)

10. Higher levels of congestion will be tolerated in urban areas. (Page 4.)

11.
next
year

An effort should be made to minimize the vehicle miles traveled at LOS E and F on individual road segments in a policy area before setting the threshold. (Page 4.)

12. The committee accepts the transportation modeling system, TRIMS, but believes a determined effort should be made to refine it. (Page 4.)

13. The committee recommends increased emphasis on identifying any skewing that may occur as the result of using forecasts and estimates. (Page 5.)

Work
figures
elements
for further

14. The maximum number of safety checks possible should be built into the process for setting thresholds because of the heavy reliance on forecasts and assumptions. (Page 5.)

15. A more detailed examination of the model, its data and its behavior should be undertaken with a view toward improvements; time and resources should be made available for this purpose. (Page 5.)

16. The committee recommends study of the sensitivity of the model to changes in internal model parameters and input variables. (Page 6.)

17. Staff should begin to look at newer methods in other transportation modeling systems, particularly with reference to including an intersection submodel and a public transit submodel that would handle both rail and bus. (Page 6.)

18. The committee recommends a broadened in-house knowledge of the model, better documentation of the systems and how to use the model and better logs of model runs. (Page 6.)

→ 19. Staff should prepare a separate reference document describing the principles and methods used in determining the thresholds. (Page 6.)

20. Basic trip generation rates need to be more thoroughly validated. (Page 7.)

21. The committee accepts 50 percent construction funding in the CIP or CTP as a reasonable level for including a road project as capacity in the system. (Page 7.)

22.

It would be desirable if road projects that either cross several policy areas or will be built in stages could be entered in the model by policy area segments; the committee suggests that the Planning Board make the decision regarding which segments of a project to include. (Page 7.)

overdue
have to be PH;
available for PH;
they can't be
when road work
isn't work program

23. The committee is concerned about the long-term effects on road congestion of outside traffic coming into or passing through the county from other jurisdictions. (Page 7.)

The Thresholds - How They Are Used

24. The point for applying the APF test should continue to be at preliminary plan. (Page 8.)
25. The point for counting approved projects against the threshold of available transportation capacity should continue to be at sewer authorization. (Page 8.)
26. For residential development, the committee recommends a system for discounting the pipeline of approved projects, on a policy area basis, which would take into account: age of the sewer authorization, the fact that building apartments is unlikely at the present time, and an anticipated buildout rate for large developments. (Page 8.)
27. For non-residential development (employment), the committee recommends a system for discounting the pipeline, by policy area, which would be based on an OED staff evaluation of speculative office development projects, case by case. (Page 9.)
28. The discounting processes should be reviewed annually. (Page 9.)

Local Area Review

29. Local area review should continue in its present form for one or two years of monitoring; during this time it should not be initiated by citizen request. (Page 10.)
30. The MCPB should notify appropriate county government officials when a potential for excessive local traffic congestion is recognized so that appropriate accommodations may be made in the CIP. (Page 11.)
31. Staff should explore whether calculated levels of service at certain intersections are inconsistent with perceived levels of service. (Page 11.)

Threshold Flexibility and Developer Participation

32. Language in the CPP report should reflect caution in allowing thresholds to be exceeded. (Page 11.)
33. Thresholds should be considered both a means of alerting the public sector to the need and to its responsibility for providing public facilities and a measure of capacity for purposes of administering the APFO. (Page 11.)

34.

The Planning Board should be able to exceed a threshold temporarily in order to implement public policies, such as housing or economic development, but should use this ability sparingly. (Page 11.)

35.

The APFO is a tool for orderly growth and should not be used by government as a means of avoiding its responsibility for providing adequate public facilities. (Page 12.)

36.

There are problems with road "clubs;" the committee urges the Board and other appropriate government agencies to address this issue. (Page 12.)

37.

The committee recommends an emphasis on alternative, non-roadbuilding means to satisfy the APFO requirements such as Ride-Sharing, Vanpooling, Flextime, etc. (Page 12.)

Improving the Document

38.

The committee suggests including more explanatory material in the CPP report. (Page 12.)

In conclusion, the committee reiterates its belief that the current guidelines for administration of the APFO are an improvement over the previous tests. The committee hopes that the suggestions for refinement offered above can be implemented in the interests of assuring continued orderly growth in Montgomery County.





MONTGOMERY COUNTY PLANNING BOARD

of